

1 HONORABLE JAMAL N. WHITEHEAD
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78 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON AT SEATTLE10 STONEBRIDGE HOMEOWNERS
11 ASSOCIATION, a Washington Non-Profit
12 Corporation,13 Plaintiff,
14 v.
15 OREGON MUTUAL INSURANCE COMPANY,
16 an Oregon Corporation; and DOE INSURANCE
COMPANIES 1–10,
Defendants.

NO. 2:22-CV-01101-JNW

STIPULATED MOTION AND ORDER TO
CONTINUE DEADLINE FOR FILING
MOTIONS RELATED TO DISCOVERY
AND DEADLINE FOR DISCOVERY TO BE
COMPLETEDNOTE ON MOTION CALENDAR:
MARCH 21, 2024**I. STIPULATED MOTION**

Come now, Plaintiff Stonebridge Homeowners Association (“Association”) and Defendant Oregon Mutual Insurance Company (“Oregon Mutual”), by and through their respective counsel, and stipulate to this motion for a continuance of the deadlines for filing motions related to discovery and for discovery to be completed.

Counsel for the Association and Oregon Mutual have met and conferred and propose an extension of the following deadlines:

	Current Deadline	Proposed Deadline
Deadline for Filing Motions Related to Discovery	04/10/2024	04/24/2024
Discovery Completed By	05/10/2024	05/24/2024

STIPULATED MOTION AND ORDER TO CONTINUE
DEADLINE FOR FILING MOTIONS RELATED TO
DISCOVERY AND DEADLINE FOR DISCOVERY TO
BE COMPLETED - 1

STEIN, SUDWEEKS & STEIN, PLLC
16400 SOUTHCENTER PARKWAY, SUITE 410
TUKWILA, WA 98188
PHONE 206.388.0660 FAX 206.286.2660

II. GOOD CAUSE SHOWN

Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause and with the judge’s consent.” Good cause exists here because the parties have agreed to enter into mediation of this matter on April 5, 2024. For purposes of judicial economy, the parties propose that the deadlines for filing motions related to discovery and for discovery each be extended two weeks to allow the parties to prepare discovery motions and take depositions after the mediation, if necessary. This extension is not made for purposes of delay, but rather to permit the parties additional time in an attempt to resolve this matter amicably without incurring substantial further costs or requiring additional time and resources on behalf of the Court. The parties respectfully request that the Court extend the currently scheduled deadlines as set forth above. A proposed order is included herewith.

DATED this 21st day of March, 2024.

STEIN, SUDWEEKS & STEIN, PLLC

/s/ Jerry H. Stein
/s/ Justin D. Sudweeks
/s/ Daniel J. Stein
/s/ Jessica R. Burns

Jerry H. Stein, WSBA #27721
Justin D. Sudweeks, WSBA #28755
Daniel J. Stein, WSBA #48739
Jessica R. Burns, WSBA #49852
16400 Southcenter Parkway, Suite 410
Tukwila, WA 98188
Email: jstein@condodefects.com
Email: justin@condodefects.com
Email: dstein@condodefects.com
Email: jessica@condodefects.com
Telephone: (206) 388-0660
Facsimile: (206) 286-2660
Attorneys for Plaintiff

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2 DATED this 21st day of March, 2024.
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4

SOHA & LANG, P.S.

5 /s/ Jennifer P. Dinning
6 Jillian M. Henderson, WSBA #40665
7 Jennifer P. Dinning, WSBA #38236
8 1325 Fourth Avenue, Suite 940
9 Seattle, WA 98101-2509
10 Email: henderson@sohalang.com
11 Email: dinning@sohalang.com
12 Telephone: (206) 624-1800
13 Facsimile: (206) 624-3585

1 /s/ Jennifer P. Dinning

2 Jillian M. Henderson, WSBA #40665
3 Jennifer P. Dinning, WSBA #38236
4 1325 Fourth Avenue, Suite 940
5 Seattle, WA 98101-2509
6 Email: henderson@sohalang.com
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STIPULATED MOTION AND ORDER TO CONTINUE
DEADLINE FOR FILING MOTIONS RELATED TO
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BE COMPLETED - 5

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16400 SOUTHCENTER PARKWAY, SUITE 410
TUKWILA, WA 98188
PHONE 206.388.0660 FAX 206.286.2660

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2024, a copy of the foregoing ***Document*** and this ***Certificate of Service*** were served on counsel below as noted:

Attorneys for Defendant Oregon Mutual
Insurance Company:

Jillian M. Henderson
Jennifer P. Dinning
Soha & Lang, P.S.
1325 Fourth Avenue, Suite 940
Seattle, WA 98101-2509
henderson@sohalang.com
dinning@sohalang.com

- via US Mail
- via Legal Messenger
- via E-Mail
- via USDC ECF

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 21st day of March, 2024, at Tukwila, Washington.

s/Zach Heafner
Zach Heafner
Stein, Sudweeks & Stein, PLLC
16400 Southcenter Parkway, Suite 410
Tukwila, WA 98188
Email: zach@condodefектs.com
Phone: (206) 388-0660